

REMARKS/ARGUMENTS

This Amendment is being filed in response to the Final Office Action dated December 27, 2007. Reconsideration and allowance of the application in view of the amendments made above and the remarks to follow are respectfully requested.

Claims 1-14 are currently pending in the Application. Claims 1, 11 and 12 are independent claims.

In the Final Office Action, Claims 1-5 and 9-14 are rejected under 35 U.S.C. §103(a) as allegedly unpatentable over U.S. Patent No. 5,652,600 to Khormaei ("Khormaei") in view of allegedly Applicant's Admitted Prior Art (AAPA). Claims 6 and 7 are rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Khormaei in view of allegedly AAPA in further view of U.S. Patent No. 6,567,171 to Rushing ("Rushing"). Claim 8 is rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Khormaei in view of allegedly AAPA in further view of U.S. Patent No. 4,771,278 to Pooley ("Pooley"). It is respectfully submitted that the claims are allowable over Khormaei in view of AAPA alone and in view of any of Rushing and Pooley for at least the following reasons.

It is undisputed that Khormaei does not show "the generating means generates the first and second time intervals in an order

that reduces dead times between the time intervals." (See, Final Office Action, page 3, first paragraph.)

The Final Office Action relies on AAPA for showing "the generating means/controller generates the first and second time intervals in an order that reduces dead times between the time intervals" and cites FIGs. 3, 4 and paragraphs [0005], [0037], [0039] for showing this element but it is respectfully submitted that reliance on AAPA is misplaced.

While it is true that FIGs. 3, 4 show schematical timing diagrams according to the prior art, FIGs. 3 and 4 show the first and second time intervals generated in a sequential order (e.g., SF1, SF2, SF3) and not in an order that reduces dead times between the time intervals. Paragraph [0005] does state that "[i]n an MLA scheme, dead times between the subfields are minimized by proper algorithms" but does not disclose or suggest an ordering that reduces dead times between the time intervals. Paragraph [0037] describes FIG. 3 which shows a timing diagram illustrative of pulse width modulation (PWM) wherein the time intervals are sequentially ordered. Nowhere within paragraph [0037] is it disclosed or suggested that an ordering would be other than sequential and it

certainly is not disclosed or suggested that an ordering may be provided that reduces dead times between the time intervals.

Paragraph [0039] describes FIG. 4 which shows a timing diagram illustrative of employing multilane row addressing (MLA) in combination with PWM again where the time intervals are sequentially ordered. While paragraph [0039] does state that "it may be preferred to shuffle or mix up the time intervals within the frame period in order to obtain the most efficient result", this is not disclosed as being in the prior art with regard to FIG. 4.

Further, FIGS. 3 and 4 do not show a multilevel power addressing scheme wherein during time intervals of a frame period, at least a first non-zero emission level of a light emitting element during a first one of the time intervals and a second non-zero emission level during a second one of the time intervals as required by the claims. While Khormaei is cited for showing this element, it is respectfully submitted that Khormaei is merely a prior art reference that utilizes time intervals of the frame period that have a binary weighted distribution (see, paragraph [0037] of the present application. However, in the MPA-approach of the present system, the individual time intervals SF are in fact

used "n" times (with "n" being the number of voltage levels present) instead of only once as taught by Khormaei and AAPA.

Accordingly, it is respectfully submitted that the device of Claim 1 is not anticipated or made obvious by the teachings of Khormaei in view of AAPA. For example, Khormaei in view of AAPA does not disclose or suggest, a device that amongst other patentable elements, comprises (illustrative emphasis provided) "means coupled to the data lines for generating, during time intervals of a frame period, at least a first non-zero emission level of a light emitting element during a first one of the time intervals and a second non-zero emission level during a second one of the time intervals, wherein the generating means generates the first and second time intervals in an order that reduces dead times between the time intervals" as required by Claim 1, and as similarly required by each of Claims 11 and 12. Each of Rushing and Pooley are introduced for allegedly showing elements of the dependent claims and as such, do nothing to cure the deficiencies in Khormaei in view of the actually disclosed AAPA.

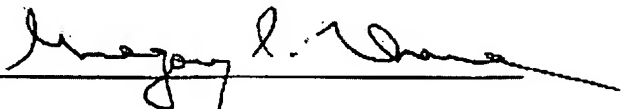
Based on the foregoing, the Applicants respectfully submit that independent Claims 1, 11 and 12 are patentable over Khormaei in view of AAPA alone and in view of any of Rushing and Pooley and

notice to this effect is earnestly solicited. Claims 2-10 and 13-14 respectively depend from one of Claims 1 and 12 and accordingly are allowable for at least this reason as well as for the separately patentable elements contained in each of the claims. Accordingly, separate consideration of each of the dependent claims is respectfully requested.

In addition, Applicants deny any statement, position or averment of the Examiner that is not specifically addressed by the foregoing argument and response. Any rejections and/or points of argument not addressed would appear to be moot in view of the presented remarks. However, the Applicants reserve the right to submit further arguments in support of the above stated position, should that become necessary. No arguments are waived and none of the Examiner's statements are conceded.

Applicants have made a diligent and sincere effort to place this application in condition for immediate allowance and notice to this effect is earnestly solicited.

Respectfully submitted,

By 

Gregory L. Thorne, Reg. 39,398  
Attorney for Applicant(s)  
February 12, 2008

THORNE & HALAJIAN, LLP  
Applied Technology Center  
111 West Main Street  
Bay Shore, NY 11706  
Tel: (631) 665-5139  
Fax: (631) 665-5101